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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAUL ESTRADA-COVARRUBIAS,

Defendant.

Case No.: 2:20-cr-00319-JCM-EJY

**STIPULATION TO CONTINUE
SENTENCING HEARING**

(First Request)

IT IS STIPULATED AND AGREED, between Ross C. Goodman, Esq., counsel for Defendant Raul Estrada-Covarrubias and Sigal Chattah, Esq., United States Attorney, and Brenna Bush, Esq., Assistant United States Attorney that the Sentencing hearing currently scheduled for Monday, April 14, 2025, shall be vacated and rescheduled to a date not sooner than 30 days from May 8, 2025.

The stipulations are entered for these reasons:

1. Sentencing is scheduled for Monday, April 14, 2025.
2. The parties need additional time to prepare for sentencing.
3. Defendant is in custody and does not object to the continuance.
4. The parties agree to the continuance.
5. This request is not made for the purpose of undue delay but is necessary to complete plea negotiations.
6. Additionally, denial of this request for continuance could result in a miscarriage

1 of justice. The additional time requested by this stipulation is excludable in computing the time
2 within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States
3 Code, Section 3161(h)(3)(D), 3161(h)(7)(A), 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

4 This is the parties' first request for a continuance relating to the Sentencing hearing.

5 Dated this 11th day of April 2025.

6
7 ROSS C. GOODMAN, ESQ.
Appointed Counsel for Defendant

JASON M. FRIERSON
United States Attorney

8 /s/ Ross C. Goodman, Esq.

/s/ Brenna Bush, Esq.

9 By _____
10 Ross C. Goodman, Esq.
Attorney Raul Estrada-Covarrubias

By: _____
Brenna Bush, Esq.
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,

Plaintiff,

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RAUL ESTRADA-COVARRUBIAS,

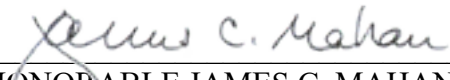
Defendant.

Case No.: 2:20-cr-00319-JCM-EJY

**ORDER CONTINUING SENTENCING
HEARING**

IT IS HEREBY ORDERED that the Sentencing hearing currently scheduled for Monday,
April 14, 2025, shall be vacated and set for **Monday, May 19, 2025 at 10:00 a.m.**

DATED April 11, 2025.


HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT COURT JUDGE